

**LAW OFFICES OF
MANOTTI L. JENKINS, LTD.**

INTELLECTUAL PROPERTY • LITIGATION • TRANSACTIONS • ENTERTAINMENT

June 3, 2024

VIA FIRST CLASS MAIL

Meta Platforms, Inc.
Attn: Legal Department
1 Meta Way
Menlo Park, CA 94025

Re: Disabled Instagram (IG) Account of Dwayne Haskins, Sr. (iridehaskins)

Dear Legal Department:

This law firm represents Dwayne Haskins, Sr. (iridehaskins). On May 14, 2024, Mr. Haskins's IG account was temporarily disabled, but his account was reinstated the same day. Then, on June 2, 2024, Mr. Haskins's account was again disabled, allegedly for violating IG's Community Guidelines, which he appealed. IG rejected his appeal and permanently disabled his account on June 2.

Please note that Mr. Haskins has posted no content on his IG site. Thus, there is no content for IG to use as a basis to claim that he has violated Community Guidelines. We note, however, that the first item that IG mentions in its message to Mr. Haskins of "Examples of things we don't allow" is: "Creating an account that looks like it belongs to a celebrity." You should be aware that Mr. Haskins is the senior "Dwayne Haskins", while his son, "Dwayne Haskins, Jr.", was a famous NFL football player prior to his tragic death in 2022. Mr. Haskins has another family member, whom this firm also represents, and a non-profit entity that have been forced to deal with inappropriate disabling, appeals and challenges for several months because of improper challenges to their accounts whenever there is a reference made to the name and likeness of their deceased family member, Dwayne Haskins, Jr. You should also note that there are other IG members named, "Dwayne Haskins," whose accounts have not been disabled; so, to the extent IG's position is that Mr. Haskins has created "an account that looks like it belongs to a celebrity," who is his son, that same standard appears not to apply to others. Accordingly, this matter has now risen to the level of harassment against our clients and we are respectfully requesting that the conduct be discontinued.

On behalf of our client, Mr. Haskins, therefore, we are requesting that IG immediately reinstate his IG account (iridehaskins). You may contact us at (202) 760-1457 or at mj@mljlawoffices.com if you would like to discuss this matter further.

601 Pennsylvania Avenue,
N.W., South Building,
SUITE 901
WASHINGTON, DC 20004
OFFICE/CELL: 202.760.1457

161 North Clark Street,
SUITE 1700
CHICAGO, IL 60601
OFFICE/CELL: 312.208.9537

Legal Department

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Thank you.

Sincerely,

/s/ Manotti L. Jenkins

Manotti L. Jenkins

cc: Mr. Dwayne Haskins, Sr.